

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	1:22-cr-63-JMS-MG-1
)	
QUINTEZ TUCKER,)	
)	
Defendant.)	

MOTION FOR ORDER ALLOWING TEMPORARY RELEASE CONDITIONS

Comes now the Defendant, by Counsel, and respectfully moves the Court to order temporary release conditions to allow Defendant to attend the funeral of his brother, Lee Boyd, Jr. In support thereof counsel for the Defendant would show the Court as follows:

1. On April 16, 2024, Mr. Tucker plead guilty to counts 2, 4, 6, 8, 10, 12, 14 and 16 of the Indictment and is awaiting sentencing. Mr. Tucker is currently housed at the Clinton County Jail in Frankfort, Indiana.
2. On June 11, 2024, Mr. Tucker's brother, Lee L. Boyd, Jr., was killed. His funeral services are scheduled for Friday, June 28, 2024 at Greater Progressive M.B. Church, located at 1825 E. 25th Street, Indianapolis, IN 46218. Family viewing is from 2:00 p.m. to 3:00 p.m. See attached.
3. Mr. Tucker seeks temporary release conditions to allow him to travel to and from his brother's funeral services/visitation at the Greater Progressive M.B. Church, to return thereafter to custody at the Clinton County Jail.

4. Family members are available to transport Mr. Tucker to and from the services.
Mr. Tucker's family is also willing to pay the costs of any services needed to transport Mr. Tucker.
5. Undersigned counsel has contacted AUSA Jeremy Fugate regarding this request, but has not received a response by the time of filing.
6. Family members are in agreement to submit to such undertakings that the Court may direct in connection with the relief sought.

WHEREFORE, Quintez Tucker, by counsel, moves the Court to enter its Order to the United States Marshal to allow Mr. Tucker's temporarily released to attend the funeral/family visitation of his brother, Lee Boyd, Jr.

Respectfully submitted,

Denise L. Turner

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CERTIFICATE OF SERVICE

I certify that on June 18, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Denise L. Turner

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